

July 9, 2018

Dear Senator XXXX,

Recognizing the promise of autonomous vehicles, the National Society of Professional Engineers has been a leading advocate on the need to place the public health, safety, and welfare first, and to require a licensed professional engineer to play a key role in the development, testing, and safety certification of autonomous vehicles. NSPE is disappointed and concerned that the US Senate is considering attaching the pending AV START ACT (S. 1885) to the Federal Aviation Administration Reauthorization Act (S. 1405).

The AV START ACT would allow the Department of Transportation to exempt as many as 100,000 autonomous vehicles per manufacturer from federal safety regulations. This legislation would essentially allow automakers to deploy autonomous vehicles without first properly addressing the major safety, technological, and ethical implications. NSPE and the professional engineers it represents have a foremost responsibility to protect the public health, safety, and welfare—and to make others aware of ways that safety may be jeopardized.

Recent incidents involving autonomous vehicles have demonstrated that the technology is not quite ready for widespread use on our nation's highways and streets. In fact, the National Transportation Safety Board has several open investigations on autonomous vehicle accidents that will produce findings likely to have a direct bearing on the AV START ACT.

NSPE understands and shares interest in the impact of emerging technologies to transform our society for decades to come, but autonomous vehicle manufacturers should be required to demonstrate capability for safe driving before further expansion and rollout. It would be egregious to push the AV START Act through by tacking it onto a must-pass bill, as the AV START ACT does not properly address the safety, technological, and ethical implications of deploying autonomous vehicles. Doing so would circumvent the regular legislative process and cut it off from full debate, discussion, transparent consideration, and the offering of amendments.

NSPE urges the Senate to delay action to revise the legislation to provide appropriate safeguards, sufficient accountability, and the necessary security measures to prevent hacking before allowing deployment of highly automated vehicles.

In representing professional engineers and their commitment to upholding the public health, safety, and welfare, NSPE has long advocated for a comprehensive and informed approach to developing and deploying fully autonomous vehicles, and recently released a policy guide with guidelines to measure the safety readiness

of these vehicles. Our hope is that public policy decision makers, like yourself, will heed these guidelines and consider the major safety, technological, and ethical implications at stake to mitigate future accidents.

Given the unique technical and ethical expertise that professional engineers possess, NSPE strongly believes professional engineers should play a key role in addressing the ethical and technological challenges raised by autonomous vehicles. Therefore, we oppose the AV START ACT. NSPE greatly appreciates this opportunity to comment. If we can answer any questions or respond to any comments, please contact Arthur Schwartz, Deputy Executive Director & General Counsel, at aschwartz@nspe.org.

Sincerely,



Tom C. Roberts, P.E., F. NSPE
NSPE President

Attachment: Autonomous Vehicles: A Public Regulatory Policy Guide